

Managing Polychlorinated Biphenyls

Los Alamos National Laboratory
Laboratory Implementation Requirement LIR404-00-06.1
Original Issue Date: January 7, 1999 (Revised 9/26/2000)

Mandatory Document

1.0 INTRODUCTION

Lessons Learned Note: [Click here](#) for Lessons Learned *that may apply* to the requirements contained in this LIR.

1.1 Overview

This document contains the requirements for processing, distributing, using, storing, disposing, and marking materials contaminated with polychlorinated biphenyls (PCBs). PCBs are a family of variously chlorinated biphenyl molecules. Objects contaminated with one or more species of PCB are known as PCB Items. The U.S. Environmental Protection Agency regulates the management of PCBs under the Code of Federal Regulations Title 40 Part 761, "Polychlorinated Biphenyls." Implementation of the applicable federal regulatory requirements and Laboratory policy shall be mandatory for all operations involving PCBs.

This document shall be effective on the date of issue. See Attachment A for recommended major implementation criteria for self-assessment.

This revision cancels Notice 0033, PCB Management Regulation Changes.

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2.0 PURPOSE

Laboratory facilities that use PCB Items and/or generate and/or manage PCB wastes shall meet the requirements in this document to comply with federal, state, and Laboratory requirements.

3.0 SCOPE AND APPLICABILITY

This document lists regulatory requirements, provides definitions for terms commonly used when managing PCB waste and performing PCB related operations, and defines roles and responsibilities. Solid waste containing non-regulated concentrations of PCBs shall comply with LIR 404-00-04, "Managing Solid Waste."

4.0 ACRONYMS

BUS-4	Materials Management Group
CFR	Code of Federal Regulations
DOT	U.S. Department of Transportation
EM&R	Emergency Management and Response Office
EPA	U.S. Environmental Protection Agency
ER	Environmental Restoration
ESH	Environment, Safety, and Health Division
ESH-5	Industrial Hygiene and Safety Group
ESH-18	Water Quality and Hydrology Group
ESH-19	Hazardous and Solid Waste Group
FM	Facility Manager
FWO-SWO	Facility & Waste Operations–Solid Waste Operations
JCNM	Johnson Controls Northern New Mexico
LIR	Laboratory Implementation Requirement
NMAC	New Mexico Administrative Code
PCBs	polychlorinated biphenyls
PRS	potential release site
SPCC	Spill Prevention, Control and Countermeasure
SOP	standard operating procedure
TSCA	Toxic Substances Control Act
WAC	Waste Acceptance Criteria

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5.0 DEFINITIONS

Capacitor: A device for accumulating and holding an electric charge and consisting of conducting surfaces separated by a dielectric.

Small capacitor: a capacitor that contains less than 1.36 kg (3 lb) of dielectric fluid.

Large, high voltage capacitor: a capacitor that contains 1.36 kg (3 lb) or more of dielectric fluid and which operates at 2,000 volts (ac or dc) or higher.

Large, low voltage capacitor: a capacitor that contains 1.36 kg (3 lb) or more of dielectric fluid and which operates below 2,000 volts (ac or dc).

Fluorescent light ballast: A device that electrically controls fluorescent light fixtures and includes a capacitor containing 0.1 kg or less of dielectric fluid.

General Storage Area: A PCB storage area that meets specific record-keeping and construction requirements, including secondary containment, for up to 90-day, on-site storage of PCB waste.

Leak or leaking: Any instance in which PCB Articles, Containers, or equipment have any PCBs on any portion of their external surfaces.

Non-PCB Transformer: Any transformer that contains less than 50 ppm PCBs. Any transformer that has been converted from a PCB transformer or a PCB-contaminated transformer **cannot** be categorized as a non-PCB transformer until it has been formally reclassified in accordance with the requirements of 40 CFR § 761.30.

PCB Articles: Any manufactured articles (other than *PCB containers*) that may contain or have been in direct contact with PCBs, e.g., capacitors, transformers, electric motors, pumps, and pipes.

PCB article container: Any package, can, bottle, bag, barrel, drum, tank, or other device used to contain PCB articles or equipment, the internal and external surfaces of which has not been in direct contact with PCBs.

PCB Containers: Any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB articles, the surface of which has been in direct contact with regulated PCBs.

PCB-contaminated electrical equipment: Any electrical equipment that contains equal to or greater than 50 ppm but less than 500 ppm PCBs including but not limited to: transformers, capacitors, circuit breakers, reclosers, voltage regulators, switches, electromagnets, and cables.

NOTE: Oil-filled electrical equipment other than circuit breakers, reclosers, and cable whose PCB concentration is unknown must be assumed to be PCB-contaminated electrical equipment.

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PCB-contaminated transformer: A transformer that contains equal to or greater than 50 ppm but less than 500 ppm PCBs.

PCB equipment: Any manufactured item (other than a *PCB container* or a *PCB article container*), which contains a PCB article or other PCB equipment.

Examples: Microwave ovens, electronic equipment, and fluorescent light ballasts and fixtures.

PCB item: Any PCB article, article container, container, or equipment, any part of which deliberately or unintentionally contains or is contaminated with PCBs.

PCB bulk remediation waste: Bulk remediation waste is any non-liquid waste or debris generated as a result of any "historical" PCB spill cleaned up under 40 CFR § 761.61, including soil, sediments, dredged materials, sewage sludge, and industrial sludge.

PCB transformer: Any transformer that contains 500 ppm PCBs or greater.

Temporary Storage Area: A PCB storage area subject to an approved SPCC plan, designated for up to 30-day, on-site storage of PCB waste.

6.0 PRECAUTIONS AND LIMITATIONS

1. Failure to comply with this requirement could cause the Laboratory to incur penalties and fines due to noncompliance with 40 CFR Part 761 standards.
2. The 40 CFR Part 761 standards specify time requirements for reporting and cleaning up of PCB spills above certain quantities and concentrations. In some cases, spills may have to be reported to the National Response Center in 24 hours or less. Clean-up procedures may have to be initiated in 24 hours and completed within 48 hours {40 CFR § 761.125}. Therefore, if a spill or release of PCBs has occurred, Emergency Management and Response (EM&R) shall be contacted immediately for notification and proper procedure in accordance with LIR201-00-04 "LANL Incident Reporting Process".
3. The Hazardous and Solid Waste Group shall be notified prior to conducting research and development activities involving the use of PCBs.
4. Only personnel authorized in Safe Work Practices shall:
 - Conduct PCB cleanups
 - Manage PCB waste
 - Repair PCB Items

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5. Waste liquids with PCBs equal to or in excess of 50 ppm may be stored at the site of generation only if they are stored in a temporary PCB storage area (30-day maximum) or within a general PCB storage area (90-day maximum).
6. Where disposal or cleanup is required, neither disposal nor cleanup may be avoided though dilution {40 CFR § 761.1(b)}.

7.0 RESPONSIBILITIES

Unless otherwise stated in this document, the responsible division director shall ensure that the federal, state, and Laboratory requirements specified in this document are met. Management of programmatic PCB Items and waste shall be the responsibility of the Operating Group Leader and facility PCB items and waste shall be the responsibility of the Facility Manager.

Guidance Note: Additional general waste management responsibilities are found in the LIR404-00-02, "General Waste Management Requirements."

WHO

7.1

**Operating
Groups/Facility
Managers and
Generators of PCB
Waste**

SHALL

- Determine ownership of all PCB Items and waste within the facility.
- Package, label, mark, and store all PCB Items and waste to meet the requirements of this document.
- Consult the guidance documents that pertain to management of PCBs.
- Identify and characterize all PCB items and waste.
- Perform sampling or seek assistance if the presence of PCBs is unknown but suspected.
- Contact the Hazardous and Solid Waste Group (ESH-19) with information on newly identified PCB Items or when previously identified items are moved, modified, or taken out of service.
- Ensure that the use, storage and/or transportation of PCBs does not result in PCB contamination of watercourses.
- Arrange for storage, transportation, and disposition of radioactive PCB waste.

7.2

**Waste
Management
Coordinator
(WMC)**

- Assist operating groups, facility managers (FMs), and generators in identifying, packaging, marking, labeling, and characterizing PCB waste.
- Coordinate transportation of PCB waste with Facility & Waste Operations–Solid Waste Operations (FWO-SWO).

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7.3 FWO-SWO (or the FWO-SWO Contractor)

- Arrange for storage, transportation, and disposition of non-radioactive PCB waste.
- Arrange for the disposal of radioactive PCB waste.

7.4 Water Quality and Hydrology Group

- At the request of the Hazardous and Solid Waste Group, provide assistance by reviewing plans and reports pertaining to PCB cleanups in a watercourse and development of a SPCC plan.

7.5 Hazardous and Solid Waste Group

- Act as the point of contact for Laboratory personnel regarding PCB operational and regulatory waste issues.
- Maintain the PCB inventory, database, and spill reports.
- Assign PCB identification numbers.
- Assist with efforts to identify and assess the environmental impact of PCB usage, spills, and discharges.
- Coordinate removal and reduction of PCB Items and operations.
- Assist with coordinating appropriate training for Laboratory personnel required to manage PCB Items or waste.

7.6 Materials Management Group, Transportation Team (BUS-4)

- Prepare, process, and approve shipping documentation for PCB Items and waste or authorize others to perform these responsibilities.
-

8.0 GENERAL REQUIREMENTS

To verify the presence of PCBs, any PCB item or waste suspected to be contaminated with PCBs shall be treated as contaminated until the absence of PCBs is verified by analysis or by contacting the manufacturer.

Oil in capacitors or transformers, notably mineral oil transformers, shall be considered PCB-contaminated unless analyzed or certified PCB-free by the manufacturer.

The operating group or generator shall provide for characterization of all PCB items or waste.

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9.0 OPERATIONAL REQUIREMENTS

The following are operational issues before the PCB Items become waste.

9.1 Marking

PCB Items containing PCBs with concentrations equal to or greater than 50 ppm, and transport vehicles loaded with PCB Containers that contain more than 45 kg of liquid PCBs in concentrations equal to or greater than 50 ppm shall be conspicuously marked with the words "Caution: Contains PCBs" {40 CFR § 761.40} and shall have a PCB ID number.

Exceptions to this marking requirement include:

- Electrical ballasts for fluorescent lamps
- Capacitors on small electric motors
- Small capacitors (less than 3 lb of dielectric fluid) that contain only PCB-soaked insulation

9.2 Procurement and Use

The procurement of PCB Items shall be limited to uses authorized under 40 CFR Part 761, including PCB Items to be acquired for use as chemical analytical standards or for research and development (R&D). Authorized R&D activities do not include research, development or analysis for the development of any PCB product. The Hazardous and Solid Waste Group shall be contacted prior to procuring any PCB item for approval, assignment of a PCB Identification Number, and updating of the PCB inventory database.

Guidance Note: The use of PCBs in open tanks and containers or in containers that are opened frequently for adjustment or repair is in violation of federal regulations and can subject the facility to fines and penalties.

9.3 Combustible Materials

Combustible materials shall not be stored within a PCB transformer enclosure or within 17 ft of a PCB transformer {40 CFR § 761.30(a)}.

Examples: Paint, solvents, plastics, paper, and wood.

Guidance Note: Combustible materials can never be stored within any transformer enclosure. See the National Electrical Code for restrictions on the proximity of combustible materials to other types of transformers.

9.4 On-Site Transfers

PCB Items shall be transferred in accordance with LIR405-10-01, "Packaging and Transportation." The Hazardous and Solid Waste Group shall be notified when PCB Items are relocated.

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9.5 Off-Site Transfer

PCBs and PCB Items shall not be transferred off Laboratory property for use at other facilities.

PCBs and PCB Items shall not be offered for redistribution.

Equipment potentially contaminated with PCBs may be transferred off-site for repair. The Hazardous and Solid Waste Group shall verify the equipment contains less than 50 ppm PCBs and is marked accordingly.

No equipment shall be moved off Laboratory property if the PCB concentration is equal to or greater than 50 ppm.

9.6 Air Compressors

Air compressors containing PCBs must have their PCB concentration reduced to less than 50 ppm {40 CFR § 761.30(s)}.

9.7 Transformers

A visual inspection of each PCB transformer in use or stored for reuse shall be performed at least once every 3 months by the owner or the owner's designee {40 CFR § 761.30(a)}.

If a transformer is found to be leaking it shall be repaired or replaced to eliminate the source of the leak. In all cases any leaking material shall be cleaned up and properly disposed of {40 CFR § 761.30(a)}.

9.8 Voltage Regulators

Voltage regulators with equal to or greater than 3 lb of equal to or greater than 500 ppm PCBs shall be subject to the same use conditions as PCB Transformers {40 CFR § 761.30(h)}.

9.9 PCB Spills

WARNING: PCBs shall be considered harmful. Once released into the environment, PCBs do not degrade into less harmful compounds. The EPA has concluded that PCBs are toxic and persistent. PCBs cause chloracne, a painful, disfiguring skin illness. Based on animal data, the EPA has also found that reproductive effects, developmental toxicity and oncogenicity are areas of concern to humans exposed to PCBs. If a spill occurs the following shall be implemented:

- Contact the EM&R office on all PCB spills.
- Do not conduct any cleanup operations involving PCBs before contacting EM&R.
- Only personnel authorized under Safe Work Practices shall conduct spill cleanup activities.
- Owners of spilled PCB materials shall be responsible for disposal of clean-up wastes.

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10.0 WASTE REQUIREMENTS

The LANL Waste Acceptance Criteria (WAC) shall be consulted for instructions regarding the packaging and storing of capacitors.

PCB waste shall be packaged, stored, recycled, transported and disposed of in accordance with this LIR and LIR404-00-02, "General Waste Management Requirements."

Waste containing PCBs combined with any other waste type shall also be managed in accordance with this LIR and the appropriate LIR for that waste type.

PCB capacitors shall be shorted out prior to disposal.

PCB Transformers shall be drained and flushed with a solvent, such as kerosene, prior to disposal {40 CFR § 761.60(b)} and managed in accordance with this LIR.

PCB Articles, PCB Containers, and PCB article containers stored for disposal must be marked with the date of removal from service and inspected for leaks at least once every 30 days {40 CFR § 761.65(c)}.

Waste PCB Liquids in PCB Containers at concentrations equal to or greater than 50 ppm shall be authorized for storage for up to 30 days at a temporary storage area if there is a site-specific SPCC established for that location {40 CFR § 761.65(c)} and in accordance with this LIR.

Fluorescent light fixtures with any of the following conditions, shall be assumed to contain PCBs:

- Ballasts labeled "High Power Factor"
- Ballasts labeled "Power Factor Corrected"
- No ballast label
- Illegible ballast label

Ballasts shall be placed in drums and shall not be stored for more than 90 days.

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11.0 STORAGE REQUIREMENTS

11.1 Storage of PCB Articles for reuse

PCB Articles may be stored for reuse in an area that is not designed, constructed, and operated as an approved PCB storage facility {40 CFR § 761.35}.

PCB Articles for reuse shall be authorized for storage for no more than 5 years after the date the article was originally removed from use (for example, disconnected electrical equipment) or 5 years after August 28, 1998, whichever is later, if the owner:

1. Follows all use and marking requirements that apply to the PCB article.
2. Maintains records starting on August 28, 1998 or starting at the time the PCB article is removed from use. The records must indicate:
 - The date the PCB article was removed from use or, if the removal date is not known, must designate the starting date as August 28, 1998.
 - The projected location and future use of the PCB article.
 - If applicable, the date the PCB article is scheduled for repair or servicing.

Contact the Hazardous and Solid Waste Group if PCB Articles are to be stored for over 5 years. The Hazardous and Solid Waste Group shall then request an extension of time from EPA. Such requests to EPA must be made at least 6 months before the expiration of the 5-year period {40 CFR § 761.35(b)}.

11.2 Storage Limitations for Disposal

PCBs and PCB Items shall be authorized for storage in a temporary storage area prior to transfer to TA-54 for storage or disposal if:

1. Temporary storage does not exceed 30 days.
2. PCB Containers containing waste liquids with PCBs equal to or in excess of 50 ppm are stored in accordance with a current, site-specific SPCC plan.

Guidance Note: Contact the Environment, Safety, and Health Division (ESH), Water Quality and Hydrology Group (ESH-18) for assistance in developing a SPCC.

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3. Item- specific storage requirements are met.

Guidance Note: Contact Hazardous Waste Group (ESH-19) for guidance.

4. Containers are marked with the date of removal from service
5. The storage area is posted with the PCB Large Mark [M_L]
See Attachment C.

PCBs and PCB Items shall be authorized for storage in a general storage area prior to transfer to TA-54 for storage or disposal if:

1. Storage does not exceed 90 days.
2. The storage area has an adequate roof and walls to prevent rain from entering and must be on a site at or above the 100-year flood plain.
3. The storage location includes a floor area with a minimum 6-in.-high continuous concrete curb capable of containing twice the internal volume of the largest PCB article or PCB container or 25% of the total internal volume of all PCB Articles or PCB Containers stored, which ever is greater.
4. The storage area floor and curbing are constructed of a continuous, smooth, non-porous material, which prevents the penetration of PCBs.
5. Written records are kept at the storage site on the dates of storage and these include the amounts of PCB stored.
6. Items are marked with date of removal from service.
7. The storage area is posted with the PCB M_L Mark
See Attachment C.
8. The Hazardous and Solid Waste Group (ESH-19) has approved the establishment of the on-site general storage area.

PCB bulk remediation waste shall be authorized for placement in temporary storage for longer than 30 days {40 CFR § 761.65(c)} if:

1. Storage does not exceed 180 days.
2. Wind dispersal of piled waste is controlled by means other than wetting.
3. No leachate is generated through decomposition or other reactions.
4. The storage site is equipped with an acceptable liner, cover and run-on control system.

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Any PCB waste shall be disposed of within 1 year from the date it was determined to be PCB waste or when it was removed from service {40 CFR § 761.65(a)}.

Radioactive PCB waste removed from service for disposal shall be exempt from the 1 year time limit {40 CFR § 761.65(a)} provided that:

1. FWO-SWO maintains a written record documenting all continuing attempts to secure disposal until the waste is disposed of.
2. The written record is made available to inspectors and is submitted to EPA if so requested.

All PCB Items in storage shall be inspected for leaks at least once every 30 days. Any leaking PCB Items and their contents shall be transferred immediately to properly marked, non-leaking containers. Written records of all inspections must be maintained at the facility.

PCB-contaminated waste and PCB Items must be stored at Technical Area 54 (TA-54), Area L, after 30 days have elapsed since the waste was generated or the items were removed from service or after 90 days of storage within a general storage area.

12.0 RECORDS

FWO-SWO shall complete a shipping document, EPA Form 8700-22, and attach any continuation sheets to the form. The appropriate copies shall be provided to the generator for shipping the waste.

Guidance Note: Guidance for completing Waste Disposal Request records is found in LIG404-00-03, "Waste Profile Form;" and LIG404-00-01, "Waste Generator Guidance for Completing the TRU Waste Storage Record (TWSR)."

13.0 REFERENCES

13.1

Documents

"General Waste Management Requirements," LIR404-00-02. Los Alamos National Laboratory.

"Hazardous and Mixed Waste Requirements for Generators," LIR404-00-03. Los Alamos National Laboratory.

"LANL Waste Acceptance Criteria," PLAN-WASTEMGT-002. Los Alamos National Laboratory.

"Los Alamos National Laboratory, Incident Reporting Process," LIR201-00.04. Los Alamos National Laboratory.

"Test Methods for Evaluating Solid Waste; Chemical/Physical Methods," SW-846. U.S. Environmental Protection Agency.

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Title 15 U.S.C. Sec. 2601 et seq., Toxic Substances Control Act, as amended.

Title 20, Chapter 4, Part 1 of the New Mexico Administrative Code (20 NMAC 4.1) as amended.

Title 20, Chapter 9, Part 1 of the New Mexico Administrative Code (20 NMAC 9.1) as amended.

Title 40 CFR Part 503, "Standards for the Use or Disposal of Sewage Sludge."

Title 40 CFR Part 61 Subpart M, "National Emission Standards for Asbestos."

Title 40 CFR Part 761, "Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce and Use Prohibitions."

Title 49 CFR Parts 171 through 178. (U.S. Department of Transportation regulations)

"Waste Management Coordinator Program," LS105-01. Los Alamos National Laboratory.

"The Evaluation and Cleanup of PCBs in Soil," April 1997. LANL Environmental Restoration Project.

"Guidance Booklet on Storage and Disposal of Polychlorinated Biphenyl (PCB) Waste," DOE EH-413-9914, October 1999. U.S. Department of Energy.

"EPA PCB Home Page, Interpretive Guidance, 1999 Question and Answer Manuals," ([www.epa.gov/opptintr/pcb/#Interpretive Guidance](http://www.epa.gov/opptintr/pcb/#Interpretive%20Guidance)). U.S. Environmental Protection Agency.

13.2

Document Ownership

The Office of Institutional Coordination for this document shall be the Waste Management Policy and Procedures Council.

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Air Quality Group (ESH-17)	5-0235
Biosafety Committee	7-8229
Dynamic Experimentation (DX) Division	7-5653
Emergency Management and Response (EM&R)	7-6211
Engineering Sciences and Applications (ESA) Division	7-4136
Environment, Safety, and Health Division (ESH-DO)	7-4218
Environmental Restoration Project of the Environmental Management Programs (EM/ER)	7-0808
Environmental Stewardship Office (ESO)	7-6639
ES&H Training Group (ESH-13)	7-0059
Facility Risk Management Group (ESH-3)	7-3363
Facility & Waste Operations, Solid Waste Operations (FWO-SWO)	5-6158
Fire Protection Group (FWO-FIRE)	7-9045
Gas Processing Facility	7-5396
Hazardous and Solid Waste Group (ESH-19)	7-0666
Health Physics Operations Group (ESH-12)	7-7171
Industrial Hygiene and Safety Group (ESH-5)	7-5231
Johnson Controls Northern New Mexico	7-2109
Materials Management Group (BUS-4)	7-4127
Operational Safety Section of the Industrial Hygiene and Safety Group (ESH-5)	7-4644
Packaging and Transportation Section of the Materials Management Group (BUS-4)	7-6122
Standard Operating Procedure (SOP) Office (ESH-5)	7-9949
Spill Prevention, Control and Countermeasure (SPCC) Plan (ESH-18)	5-4752
Water Quality and Hydrology Group (ESH-18)	5-0453

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ATTACHMENT A

Guidance

Recommended Major Implementation Criteria for Self-Assessment

LIR Title	LIR Number
Managing Polychlorinated Biphenyls	LIR 404-00-06.1

The major implementation criteria listed below are provided to assist Laboratory organizations in assessing their implementation of this LIR. These criteria provide an objective basis for self-assessing implementation of the major requirements contained in the LIR. The LIR also states requirements in other areas, such as, scope, precautions, and responsibilities that, when applied, complement the successful implementation of these major requirements.

1. The most important criterion for assessing the implementation status of this LIR should be, if applicable: Have the requirements contained in the LIR been communicated to the individual(s) responsible for performing the work?

2. In addition, the recommended major implementation criteria for self-assessment of this LIR are the following:

- Organizations or facilities shall identify/verify the presence of Polychlorinated Biphenyls (PCBs), any PCB item or waste suspected to be contaminated with PCB.
- PCBs and PCB Items shall not be transferred off Laboratory property for use at other facilities.
- Perform self-assessment of waste management activities for compliance with the stated requirements of this document
- Develop action plan for identification and implementation of corrective actions where noncompliance is identified
- Complete and document implementation of corrective actions, including training on new or revised activities

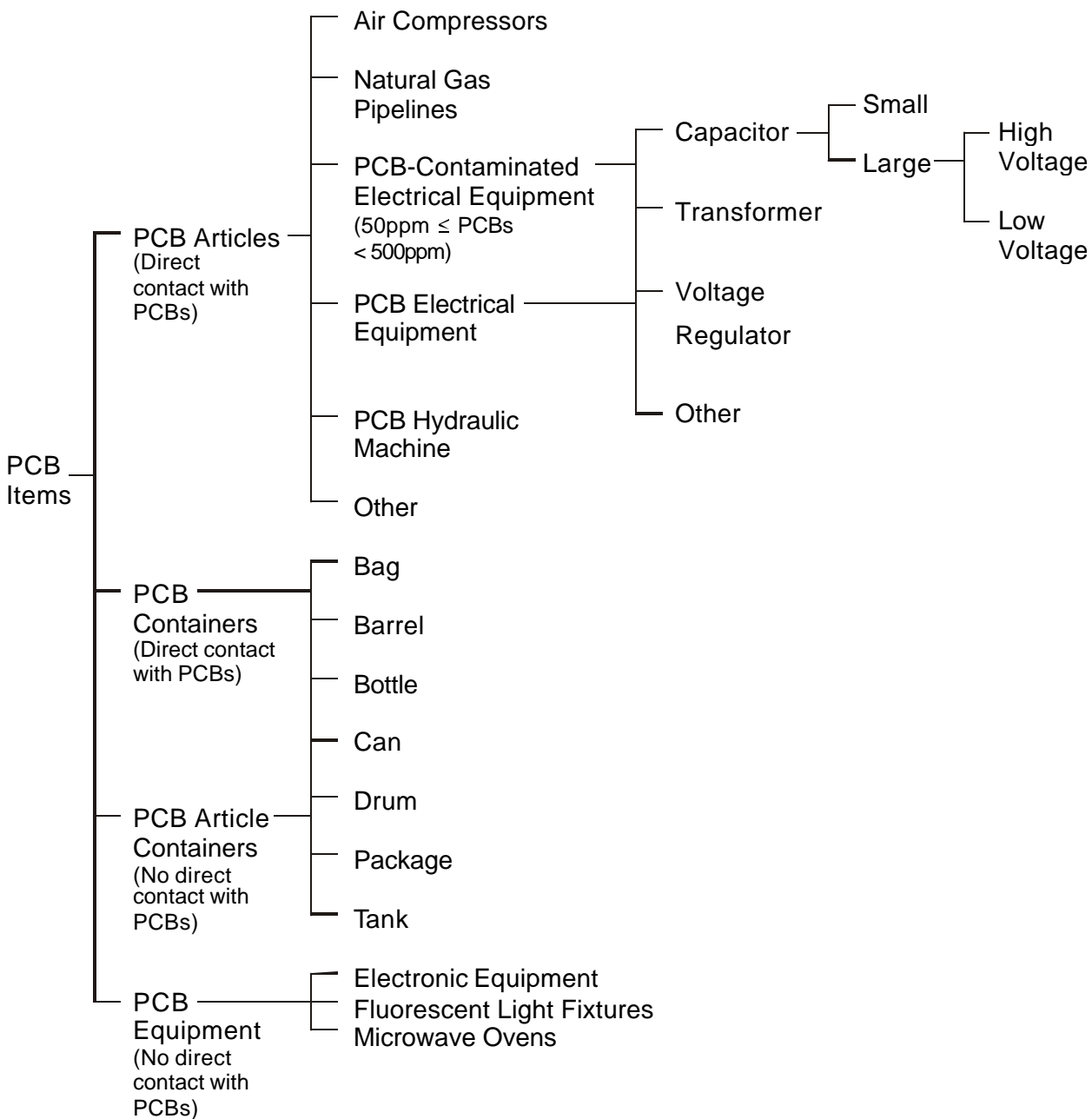
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ATTACHMENT B

Hierarchy of PCB Items



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PCB Large Mark (M_L)

